

1 **Ronald Britt**

02:10:17 2 *(Whereupon, eight-page, 10/11/13,*
02:10:17 3 *Compensation Report Thermal Realty*
02:10:20 4 *Associates, LP, Check Dates 1/6/2011 to*
02:10:25 5 *12/30/2011, was marked as Exhibit 10,*
6 *for id.)*

02:10:00 7 Q. I'm asking you to take a look at what
02:10:03 8 we've just marked as Exhibit 10 for
02:10:06 9 identification, Mr. Britt. *(Handing)*

02:10:06 10 A. That's this?

02:10:08 11 Q. I'm asking you just to take a look at
02:10:10 12 it, okay?

13 *(Witness peruses exhibit)*

02:10:11 14 Have you seen this document before
02:10:12 15 today?

02:10:12 16 A. I don't think so.

02:10:13 17 Q. And I'm representing that this is a
02:10:16 18 document called Compensation Report Thermal
02:10:20 19 Realty Associates, LP, Check Dates 1/6/2011 to
02:10:25 20 12/30/2011. And it has your name on every page.

02:10:29 21 Do you see that?

02:10:30 22 A. I see that.

02:10:36 23 Q. Would you turn to Page 4 of the
02:10:38 24 exhibit.

02:10:47 25 *(Witness peruses exhibit)*

Ronald Britt

Looking for one more moment at the invoice which is on Page 5 of Exhibit 8. You say you submitted an invoice for \$2,180; is that right?

A. Yes.

Q. And were you actually paid \$2,180?

A. I would have no reason to think I wasn't.

Q. And looking at Page 4 of Exhibit 10, the third entry from the bottom --

A. Yes.

Q. -- it has your name on it and it says "Apartment repair earnings:", and then it has "2,179.99."

And do you see that?

A. Yes, I do.

Q. And then it says, "Number of hours:". Do you see that? Next to that. To the left of the 2,179.99.

A. No, I don't.

Q. Well, you see your name on that line, "Ronald."

A. Okay. Yes. And it does show hours.

Q. Right. It shows hours at

Ronald Britt

249.14 hours; is that correct?

A. It does.

Q. And it says, to the left of that,
"Apartment repair earnings: \$13.125 an hour."

Do you see that?

A. I do.

Q. Do you have any understanding --

A. I have no idea where they get any of
that.

Q. -- of what that represents?

A. No, I don't.

Q. Did you ever submit an invoice to
Mr. Yablonsky that reflected 249.14 hours to do
the job that's reflected on Page 5 of Exhibit 8?

A. I don't recall ever submitting an
invoice that showed hours, period. But I may
have.

Q. But you don't recall?

A. I don't recall.

Q. But certainly Page 5 --

A. I would have to -- I would have to
look through, but --

MR. KOERNER: "I don't recall," is
fine.

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Ronald Britt

A. It's a range based on materials, hours, and what is reasonable. And as I said, more often than not, I charged less.

Q. And this was a check that seems to have been issued -- the 2,179.99, to have been issued on 7/22/2011; is that correct?

A. Where are you getting that?

Q. Third entry from the bottom of Page 4.

A. Okay. I see that.

Q. And you also were issued a check for your regular weekly compensation of \$350 --

A. Yes.

Q. -- on 7/22/2011; is that correct?

A. Yes.

Q. And that \$350 represented payment for your services, as you say, 24/7; is that correct?

A. That, and the apartment, and the utilities, and the phone.

Q. And for the same -- and that represented your payment for the same time that you were also performing work, which is reflected on Page 5 of Exhibit 8; is that correct?

A. On the weekend. And probably not

Ronald Britt

just me. I think there were two other people helping me on that.

Q. Is it correct that the payment of \$350 that was issued July 22nd, 2011, was paid for the same period of time in which you performed the services reflected on Page 5 of Exhibit 8?

A. It would be the same week. But as I said, I wasn't the only one working on that job.

Q. And looking at Page 6, which you are on, of Exhibit 8, can you tell me what that is?

A. What, exactly?

Q. Well, what's the document?

A. It's an invoice.

Q. And it's an invoice which is apparently dated August 15th of 2011; is that correct?

A. Correct.

Q. And what was this an invoice for?

A. A handful of jobs at Division Street, 9th Street -- and 9th Street, and some out-of-pocket expenses.

Q. And the total invoice for the labor at these jobs is \$3,140; is that correct?

Ronald Britt

02:14:44 A. Yes.

02:14:47 Q. And were you actually paid \$3,140 for
02:14:53 this job?

02:14:55 A. I probably was.

02:14:55 Q. And would you look now again at
02:14:58 Exhibit 10, this time going to Page 5. That's
8 the compensation run right over here to your
02:15:01 left.

02:15:01 A. Oh, I know what job this is.

02:15:03 Q. Do you want to tell me what job that
02:15:05 is?

02:15:05 A. Yeah. That was Holly's apartment.

02:15:07 Q. And who is Holly?

02:15:09 A. Holly's a tenant at 319 East 9th
02:15:14 Street.

02:15:14 Q. Were you paid \$3,140?

02:15:16 A. I was.

02:15:16 Q. And is this work that you discussed
02:15:18 with Mr. Yablonsky before you actually did the
02:15:21 work?

02:15:21 A. Oh, yes.

02:15:22 Q. And did he agree to a price for this
02:15:24 work?

02:15:24 A. I believe he did.

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Ronald Britt

02:15:25

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Q. And what was the basis of the price?

02:15:27

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A. What it would take to get the job

02:15:30

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done.

02:15:30

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Q. Did you ever tell him how many hours

02:15:33

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it would take to get the job done?

02:15:35

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A. No, I didn't. But I can tell you

02:15:37

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that three other people worked with me on that

02:15:40

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job. And while I invoiced for it, I paid them

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out of the amount.

02:15:44

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Q. And were you paid \$3,140 for that

02:15:47

12

job?

02:15:47

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A. I probably was.

02:15:48

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Q. Now, taking a look again at

02:15:50

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Exhibit 10, which is the compensation on Page 5.

02:15:53

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Page 5. There's a page number at the top.

02:15:54

17

A. Okay.

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Q. And looking at the fourth entry from

02:15:57

19

the top of the page.

02:15:58

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A. Yes.

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Q. You see that there is a check which

02:16:03

22

appears to be dated 8/26/2011 for \$3,139.99; is

02:16:12

23

that correct?

02:16:12

24

A. Yes.

02:16:12

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Q. One penny less than this invoice,

Ronald Britt

which is represented on Page 6 of Exhibit 8; is that correct?

A. Yes.

Q. And next to it, it says, "Apartment Repair: 358.86 hours."

A. Again, I don't know where they get that number.

Q. And is it accurate that you never submitted an invoice based on hours? Is that what you're saying?

A. I don't recall ever submitting any hours except for other people. There was one job, and it's not here. A lady in the building named Marge, she had never had any work done at all in the apartment in the 40 years that she lived there. It was a rat hole. It was like -- bugs like you wouldn't believe. I have photos; and believe me, it's appalling. She was so embarrassed of the condition of her apartment that she would never let anyone in there. And she was very close to death. But after working with her for a few years and pleading nonstop, they finally did approve. Initially, Doreen said no. But she came up and looked at the apartment,

Ronald Britt

and then she said, yeah. And I was told to do the absolute minimum to get it up to speed. In the meantime, I contacted social services for old people. And they've assigned people to Marge, and she's doing much better.

MS. GOULD: Move to strike as nonresponsive.

Q. Looking at Page 5 of the compensation, which is Exhibit 10, were you also paid \$350 for this same period for your regular work as superintendent/janitor?

A. It's always been super, ma'am. There's no janitor in it.

Q. Okay. Were you paid your regular \$350?

A. I was.

Q. Now, when did you do this work which is reflected on Page 6 of Exhibit 8?

A. As I said, other people helped me on this job.

Q. When did you perform the work that you performed reflected on Page 6?

A. It would be after hours and on weekends, most likely.

Ronald Britt

Q. When you say "after hours," what are you talking about?

A. I mean, after normal business hours.

Q. But you said --

A. Because I have to be available for anybody that calls. And you know, if you really want to track everything that I'm doing, where are all the inspections, and deliveries, and other duties that just go with the territory? You know, people who are locked out, people who barfed in the hallway, people who are passed out drunk in the hallway and need to be helped to their apartment or helped out the door. I mean, there's a whole, whole, whole lot of work going on that is not reflected on any of this.

MS. GOULD: Move to strike as nonresponsive.

Q. Did you provide the Department of Labor, when you went to visit them on or about May 1st, 2013, with any of the invoices that are reflected on Exhibit 8?

A. I don't know that I did, ma'am.

Q. Did you provide the Department of Labor with any pay stubs which reflected payment

Ronald Britt

for any of the invoices on Exhibit 8?

A. If they were paid in the way you're showing, then they would be on the pay stub.

Q. But you don't know; is that correct?

A. I would tell you this, that for the longest time, I was paid as Ron, the handy guy, directly. And then, when I became super, I was paid as the super, and I was also paid as Ron, the handy guy, doing the side jobs; essentially, their in-house, handy-guy service. But at a certain point in time, they changed the way they started paying me. And I think that is where the Department of Labor had a problem.

Q. When did they change the way they paid you, according to you?

A. I don't know for sure, but I could look into it for you.

Q. Well, the claim that you submitted to the Department of Labor and the exhibits that I showed you earlier from the Department of Labor -- let me just pull it up. Exhibit 6 reflects a claim period commencing August 27th, 2011; is that correct?

A. So, that's probably when they changed

Ronald Britt

the way they paid me.

Q. So, when you say they changed the way they paid you, who was the "they"?

A. Whoever was issuing my regular paycheck via direct deposit.

Q. And what was the change that you say they made?

A. I think that the change had something to do with -- they previously never listed hours, but then they started listing hours.

Q. Who started listing hours, where?

A. The people issuing the check. So, that would be Thermal'd's pay person.

Q. Did you show the Department of Labor any checks issued to you after August 27th of 2011?

A. I showed them everything I had.

Q. But do you know whether you had those check stubs subsequent to August 27th, 2011?

A. I would have to go through them. My attorney has them now, and I'd have to look through and see.

Q. Your attorney has pay stubs from August 27th, 2011?

Ronald Britt

A. I think he has pay stubs going back to day one, if I'm not mistaken.

And I can show you that I used to get paid differently then, at a certain point.

Q. So, at this certain point, which you think was around August 27th, 2011, how were you paid that was different for these extra jobs than you were paid before that?

A. They started appearing on my regular pay -- they would give me one check for everything, as opposed to a separate check. I'd get one check for being super. I'd get another check for being handy.

MR. ETTINGER: Prior to August of 2011, you're saying?

THE WITNESS: Well, I'd have to check on those dates --

MS. GOULD: Well, I'm not clear.

THE WITNESS: -- but, yeah, there was a shift at one point.

MS. GOULD: Okay. I'm not clear.

THE WITNESS: And I think that's where the Department of Labor had a problem. Because as I understand it --

Ronald Britt

MS. GOULD: Go ahead.

THE WITNESS: -- the rules on how supers are paid are set in Albany. And when they changed from that, that's when all of this became an issue. And that's really technical, and I don't fully understand it. I've discussed it with Greg, and he has a better understanding of it than I do.

Q. So, let's clarify: Prior to August 27th, 2011, you were paid, how?

A. I got a separate check for all the work that I did as a handy guy, as Ron, the handy guy.

Q. Separate from your regular pay?

A. Right.

Q. And what happened, if anything, after August 27th, 2011?

A. Well, for a while there, they were just paying me based on the number and taking taxes out on even the materials, too. So, that's why I had started changing the invoice to say, "Tax that part, and don't tax the reimbursement."

Q. And so, you started breaking out the

Ronald Britt

materials and reimbursement --

A. Separately.

Q. -- versus the labor?

A. Correct.

Q. Now, did Mr. Yablonsky ask you to do that?

A. No. I elected to do that, because they were taxing the money that I put out as materials.

Q. Now, you said just now that prior to August 27th, 2011, you were getting a separate check for Ron, the super and for Ron, the handy guy.

A. Correct.

Q. And how, if at all, did that procedure change after August 27th, 2011?

A. I don't know. But on the paychecks, it started showing hours, where it never had before.

Q. After August 27th, 2011 --

A. And it started showing that I was being paid something like \$8.41 an hour and -- whatever minimum wage is. And that's something I never agreed to.

Ronald Britt

Q. After August 27th, 2011, did you continue to get paid for these extra jobs as Ron, the handy guy?

A. I continued to get paid for those jobs.

Q. How did you go about -- well, withdrawn.

What was the procedure by which you got paid for those jobs after August 27th, 2011?

A. The procedure was the same. I submitted invoices, and they paid me. But the difference is they started paying me showing it on my regular paycheck, instead of giving me a second check.

Q. So, give me a moment.

THE WITNESS: While you have a moment, would you mind if I visit the men's room?

MS. GOULD: Please.

(Recess held from 2:24 to 2:42 p.m.)

MS. GOULD: Mark this, please.

(Whereupon, 3-page email chain was marked as Exhibit 11, for id.)

CONTINUED EXAMINATION BY MS. GOULD:

1 **Ronald Britt**

02:42:18 2 Q. Mr. Britt, I'm going to ask you to
02:42:22 3 take a look at Exhibit 11. You're looking at an
02:42:26 4 unmarked copy there, I think. *(Handing)*

02:42:29 5 *(Witness peruses exhibit)*

02:42:34 6 It's a three-page exhibit, the last
02:42:36 7 page of which is upside down, but... At least on
02:42:42 8 my copy.

02:43:00 9 Do you recognize Exhibit 11?

02:43:02 10 A. The first page is an invoice.

02:43:06 11 Q. What about the second and third
02:43:08 12 pages?

02:43:10 13 A. The second page is an invoice and
02:43:17 14 reimbursement, as is the first. And the third
02:43:21 15 one appears to be all labor.

02:43:27 16 Q. Now, I thought you indicated earlier
02:43:31 17 that at some juncture there was a change in the
02:43:35 18 procedure by which you were paid for these extra
02:43:39 19 jobs; is that correct?

02:43:40 20 A. Yes, ma'am.

02:43:41 21 Q. And you thought that might've been in
02:43:43 22 August of 2011?

02:43:44 23 A. I can't be sure, but I'll check and
02:43:46 24 let you know on Friday.

02:43:48 25 Q. And are you saying that after that

1 *Ronald Britt*

02:43:50 2 point - whenever it was - you were paid in one
02:43:53 3 check for both your regularly, weekly
4 compensation --

02:43:57 5 A. And my Ron, the handy-guy work.

02:43:58 6 Q. -- and your handy-guy work? And
02:44:01 7 you're sure about that; is that correct?

02:44:01 8 A. I'm pretty sure, yes.

02:44:02 9 Q. And for what period of time did that
02:44:05 10 continue?

02:44:06 11 A. Whenever the shift was, that was it.
02:44:08 12 I don't recall getting another check that was
02:44:10 13 just a separate invoice check.

02:44:12 14 Q. But you don't know when the shift
02:44:14 15 was; is that correct?

02:44:14 16 A. No. Actually, you know what, I think
02:44:16 17 that the very last check I got was separate.
02:44:21 18 That they -- they gave me my regular, weekly
02:44:25 19 deposit for my super work, and they gave me a
02:44:31 20 deposit for that 1,250 bucks. And then, they
02:44:36 21 took them both right back out. So, except for
02:44:39 22 that, I think it's always been one check.

02:44:42 23 Q. Whenever the shift occurred -- and
02:44:44 24 you don't know when; is this right? You started
02:44:47 25 to get one check that was a combined total of

Ronald Britt

your payment as a super and your payment as a handy guy --

A. Right.

Q. -- is that right?

A. And they also started attributing hours, which they never had done before. And the hours reflected \$8 and change per hour, as opposed to what I understand the Albany rule is, based on how many units per week.

MS. GOULD: Mark this.

(Whereupon, invoices for pages numbered 43 - 53 were marked as Exhibit 12, for id.)

Q. Can you take a look at Exhibit 12, please. *(Handing)*

(Witness peruses exhibit)

A. Okay.

Q. Can you tell me what Exhibit 12 represents?

A. It looks like more invoices.

Q. Are these for the year 2012?

A. Yes.

Q. And these are invoices for work that you did as, quote/unquote, "Ron, the handyman"

Ronald Britt

in 2012; is that correct?

A. Yeah, all of these seem to be handy-guy jobs.

MS. GOULD: Hold on one second.

(Pause in the record)

Q. I'd like to take a look now again at the complaint, which was Exhibit 2. Here you go.
(Handing)

Looking at Paragraph 14 of your complaint, Paragraph 14 says specifically,
(Reading:) Shortly after he - meaning, you - was hired by Ms. Alderman, who was divorced and going through the death of her father, the former principal of Thermald, plaintiff began to receive unsolicited and unwanted sexual advances from Ms. Alderman.

Specifically, when did you begin receiving these unwanted and unsolicited sexual advances?

A. When I first met her, she was flirting with me at the shop after having signed the lease and when they had offered me the super job to begin with. I didn't want to do it, because it involved cleaning. She hired Brendan.

Ronald Britt

But she went on and hired me to do several other jobs for her. And in each case, flirted with me a lot to get the price down, which I never budged on my prices. And I didn't go out for coffees, lunches with her, either. So, that's when it began.

And then, later, when I became the super, she had me doing a lot of other things that had really nothing to do with the job.

Q. What I'm asking you is: When did these unsolicited and unwanted sexual advances from Ms. Alderman begin? A date.

MR. KOERNER: Objection; asked and answered.

A. From day one.

Q. Day one of, what?

A. When I first met her, the day I signed the lease.

Q. And that is in 2005?

A. If that's what the lease says, yeah.

MR. KOERNER: Where's the exhibit?

MS. GOULD: Exhibit 1.

MR. ETTINGER: August 1st, 2005.

Q. I'm showing you Exhibit 1. So, are

1 *Ronald Britt*

02:51:17 2 you saying that these, quote/unquote, "unwanted
02:51:19 3 and unsolicited advances" began on or about
02:51:24 4 August 1, 2005?

02:51:25 5 A. Well, the lease was signed July.

02:51:27 6 Q. So, when did these advances begin?

02:51:30 7 A. That's when it began, when I first
02:51:32 8 met her.

02:51:32 9 Q. What form did these unsolicited and
02:51:36 10 unwanted advances take?

02:51:36 11 A. Initially, just blatant flirting.

02:51:39 12 Q. What is flirting?

02:51:40 13 A. Well, I wouldn't care to define it,
02:51:43 14 ma'am. You know what it is or you don't.

02:51:45 15 Q. Well, can you define it any way,
02:51:48 16 other than using the word "flirt"?

02:51:48 17 A. Smiles, eye batting, suggestive
02:51:51 18 conversation.

02:51:52 19 Q. What kind of suggestive conversation
02:51:54 20 did Ms. Alderman engage in, commencing in or
02:51:58 21 around August of 2005?

02:51:59 22 A. Just kind of leaning in, leading-me-on
02:52:03 23 kind of banter.

02:52:04 24 Q. And when you say "leaning in," what
02:52:09 25 do you mean?

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Ronald Britt

02:52:10 2 A. Ma'am, when a woman is interested,
02:52:15 3 she has all subtle ways of telling you that she's
02:52:19 4 interested. Like, you know -- she has ways.

02:52:24 5 Q. And what were the ways that
02:52:26 6 Ms. Alderman used to tell you --

02:52:27 7 A. I said --

02:52:27 8 Q. -- when you say she was interested?

02:52:29 9 A. Well, initially, I thought it was
02:52:32 10 just --

02:52:32 11 MR. KOERNER: Other than what
02:52:33 12 you've already testified to.

02:52:34 13 A. -- what -- what many women will do
02:52:37 14 when they're hiring a handy guy, is try to flirt
02:52:40 15 with him to get the price down - I get a lot of
02:52:43 16 that. But later when I became the super, it
02:52:46 17 became clear to me if I wanted to keep my job, I
02:52:50 18 would have to do a lot more than just strictly
02:52:53 19 super jobs.

02:52:53 20 Q. Now, when you say it became clear to
02:52:56 21 you that if you had to keep -- if you wanted to
02:52:56 22 keep your job you would have to do more than
02:52:59 23 super jobs, did Ms. Alderman make this clear to
02:53:03 24 you?

02:53:03 25 A. Oh, yeah.

Ronald Britt

Q. What did she do to make this clear to you?

A. It's just veiled language.

Q. What kind of veiled language? What were the words that she used?

A. Ma'am, I don't know if you've ever been sexually harassed, but you know when somebody is pressuring you for sex.

Q. Well, sir, you've made a complaint of sexual harassment against my client in this action, and I am going to explore what it was, what were the actions, what were the words that you claim were sexual harassment.

A. Initially --

Q. So, what were they?

A. Initially, it was just she wanted my opinion on this or that. And then, it's like, "Oh, you're -- you're a man; you can help me with this." And then if I'm pulling away or resisting, I got indications that if I want to keep my job, I better play along.

Q. Well, when did Ms. Alderman say things like, if you're a man, you know this? When did she start to say those things to you?

Ronald Britt

02:53:58 2 A. In a car ride out to Pennsylvania.

02:54:01 3 Q. And when did that occur?

02:54:02 4 A. I think it was just a few months
02:54:04 5 after I began employment with her.

02:54:06 6 Q. So, you began your employment in
02:54:08 7 January of 2007; is that correct?

02:54:09 8 A. I don't recall the exact date that we
02:54:12 9 rode out there, but I'm sure she does.

02:54:15 10 Q. Well, I'm asking you what -- you
02:54:16 11 began your employment in January of 2007; is that
02:54:19 12 correct?

02:54:19 13 A. Okay.

02:54:19 14 Q. How long after you began your
02:54:22 15 employment did this ride to Pennsylvania take
02:54:25 16 place?

02:54:25 17 A. It was a few months into it.

02:54:27 18 Q. And how did this ride to Pennsylvania
02:54:29 19 come about?

02:54:30 20 A. 'Cause she wanted me to go to her
02:54:33 21 house in Pennsylvania and help her square away a
02:54:36 22 few things out there.

02:54:36 23 Q. And when you say "help her square
02:54:38 24 away a few things out there," did she tell you
02:54:40 25 what she wanted you to do?

Ronald Britt

A. Not specifically, no.

Q. Well, did you ask any questions?

A. I wanted to keep my job; so, I agreed to go.

Q. Did you ask her what she wanted you to do in Pennsylvania?

A. She said she had a house that was closed up there, and she wanted to square away a few things. She was not specific.

Q. And did you ask her to be specific?

A. No, I did not. I went along.

Q. And did you have an expectation that you were going to perform some kind of work when you got there?

A. I figured that she would want my opinion on some work.

Q. This is a few months after you began working as super; is that correct?

A. Correct.

I had already done several jobs for her.

Q. Where?

A. In the buildings in -- listed on this page.

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Ronald Britt

MR. KOERNER: I've got to make a few quick phone calls. I won't be more than two minutes. Okay? A few minutes.

MS. GOULD: Okay.

(Recess held from 2:55 to 2:57 p.m.)

CONTINUED EXAMINATION BY MS. GOULD:

Q. Prior to the time that you took this trip to Pennsylvania, had you had any kind of sexual relationship with Ms. Alderman? Prior to the time that you went on this trip to Pennsylvania, had you had any kind of sexual relationship with Ms. Alderman?

A. No.

Q. And where in Pennsylvania did you go?

A. It's -- I forget the name of the place. It's outside of Pottsville.

I can probably find it on a map.

Q. And what was the nature of the property that you went to?

A. It's a house. It belonged to her father and mother. He purchased it some time ago, and she was in the process of getting it renovated. She wanted to know if the contractor was doing right by her.

Ronald Britt

Q. And what did you do when you went to this house in Pennsylvania?

A. Well, initially, we stopped off at a restaurant on the way, and she bought me a couple of beers. And when we went to the house, I pointed out what I thought was correct and what wasn't. She was going to issue the contractor another check.

But then, once I was there, she asked me to help her with the bathroom. And I ended up painting the bathroom, twice, installing some fixtures - without any charge. And then, cleaning out the whole basement and organizing that.

And then, I did stay the night. And I stayed down the hall. And throughout the night Ms. Alderman was moving about scantily clad, giving me all kinds of signals that we should jump in bed.

Q. So, you started by sleeping in a separate bedroom down the hall, as you said?

A. Correct.

Q. And then, through the night you say Ms. Alderman was darting about -- is that what

Ronald Britt

you said?

A. I would say, parading.

Q. Parading about. And you said she was scantily clad; is that correct?

A. Correct.

Q. And what do you mean by "scantily clad"?

A. Not wearing much clothing.

Q. But was she wearing a nightgown?

A. She was wearing like a sheer T-shirt and underwear.

Q. Clothes that people wear to bed; is that correct?

A. Yes; but inappropriate in this situation.

Q. And why was that?

A. Because I'm an employee.

Q. Now, how many times did you see her about, scantily clad during that night?

A. Two or three times, I suppose.

Q. Okay. And did she come into your room?

A. She asked if I was all right, if there was anything I wanted.

Ronald Britt

02:59:55 Q. And what did you tell her?

02:59:56 A. I said I was fine.

02:59:57 Q. Did she come into your room?

02:59:59 A. No, she didn't.

03:00:00 Q. And how many nights did you spend

03:00:03 there on that occasion?

03:00:04 A. Just one, I believe.

03:00:04 Q. And what happened -- what did you do

03:00:08 the next day?

03:00:08 A. The next day, she took me for ice

03:00:12 cream, and we went fishing.

03:00:13 Q. And that's something that you like to

03:00:15 do; is that correct?

03:00:15 A. It is something I like to do.

03:00:18 Q. And you suggested that you go

03:00:20 fishing; is that correct?

03:00:20 A. She asked me if there's anything I'd

03:00:24 like to do. I said, "We could go fishing."

03:00:24 Q. And you did?

21 A. And we did.

03:00:24 Q. And how many hours did you spend

03:00:26 fishing?

03:00:26 A. Maybe an hour and a half.

03:00:28 Q. Sir, isn't it true that you

1 *Ronald Britt*

03:00:31 2 volunteered to do some of that work you just
03:00:34 3 described at that house in Pennsylvania?

03:00:36 4 A. Ma'am, I felt pressed into it.

03:00:38 5 Q. Isn't it true that you volunteered to
03:00:40 6 do some of that work?

03:00:42 7 MR. KOERNER: Objection; asked and
8 answered.

9 MS. GOULD: No, it's not asked and
10 answered. He didn't answer the question
11 at all.

12 MR. KOERNER: He did.

03:00:43 13 Q. Did you volunteer to do that work?

03:00:45 14 A. It seemed perfectly -- perfectly
03:00:48 15 clear to me that I would be doing extra work for
03:00:52 16 her if I wanted to keep my job.

03:00:54 17 Q. And from what did you deduce that it
03:00:56 18 was perfectly clear that you would be doing extra
03:00:57 19 work if you wanted to keep your job?

03:00:57 20 A. Because she would ask me, do I want
03:01:00 21 to keep my job.

03:01:01 22 Q. When did she first ask you, "Do you
03:01:04 23 want to keep your job"?

03:01:06 24 A. When she's suggesting we get busy
03:01:09 25 doing this, doing that, doing the other. And

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Ronald Britt

then, she would tell me these stories about how her brother died of a drug overdose, and that's his motorcycle; and how her father's dying; and -- and she felt so alone; and there's no man in her life; et cetera; et cetera.

Q. And after you spent your time fishing and having ice cream this next day, did you go back to the city, to New York City?

A. Actually, we went back to her place, and we cooked and ate that fish.

Q. You cooked and ate the fish that you caught?

A. We caught a fish -- actually, she did.

Q. And you cooked and ate the fish that she caught, in her apartment?

A. In her kitchen in her building -- in her house there in Pennsylvania.

Q. In Pennsylvania, okay.
And did there come a point in time that weekend when you returned to New York?

A. We did.

Q. So, you spent one night at that point in time in Pennsylvania?

Ronald Britt

03:02:02 2 A. Correct.

03:02:03 3 Q. And did you have any sexual
03:02:04 4 relationship with Ms. Alderman that night?

03:02:06 5 A. I did not.

03:02:07 6 Q. You say at Paragraph 15 of your
03:02:10 7 complaint, "Plaintiff resisted but was fearful
03:02:14 8 that if he did not acquiesce in Ms. Alderman's
03:02:18 9 sexual advances, he would lose his job and
03:02:24 10 residence."

03:02:24 11 A. It was plain --

03:02:24 12 Q. what sexual advances are you
03:02:26 13 referring to in this paragraph, and when did they
03:02:29 14 occur?

03:02:29 15 A. Well, I'm referring to -- to getting
03:02:32 16 me off to the country in her house alone and
03:02:35 17 making it pretty clear that she was expecting
03:02:37 18 sex.

03:02:38 19 Q. But no sex occurred; is that right?

03:02:40 20 A. No.

03:02:41 21 Q. So, in Paragraph 15 when you say,
03:02:45 22 "Plaintiff resisted but was fearful that if he
23 did not acquiesce in Ms. Alderman's sexual
03:02:50 24 advances, he would lose his job and residence.",
03:02:51 25 what sexual advances are you referring to, other

Ronald Britt

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2 than what you described as a sexual advance by
3 going to her house for the weekend?

4 A. Right. Buying me a few beers, making
5 me dinner, parading around in her underwear, and
6 just checking on me frequently. I mean, she --
7 it was clear to me that she wanted to fool
8 around, and I wasn't having it, because I was
9 uncomfortable. And frankly, it was humiliating.

10 Q. After that weekend where you did not
11 have sex -- correct? -- when, if at all, did she
12 make any sort of sexual advance to you?

13 A. It was sometime later.

14 Q. When?

15 A. I can't be sure, but it was a few
16 weeks, I think.

17 Q. So, this is sometime in the first
18 part of 2007?

19 A. I think so.

20 Q. And --

21 A. She --

22 Q. What did she do that you describe as
23 a sexual advance?

24 A. She came over to my apartment,
25 essentially, 'cause she had nothing to do, and

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Ronald Britt

03:03:51 2 cable wasn't working, and she just wanted to
03:03:52 3 watch a movie. And I was sitting on my bed, and
03:03:54 4 she was sitting on the couch. She got on my bed
03:03:57 5 and, basically, made it clear that we were gonna
03:04:00 6 have sex right then and there.

03:04:01 7 Q. How did she do that?

03:04:03 8 A. She took off her clothes.

03:04:06 9 I said, "This is a bad idea."

03:04:09 10 And she said, "So --"

03:04:10 11 Q. Did she say anything to you?

03:04:12 12 A. She said, "So what."

03:04:14 13 And I didn't want to have sex with
03:04:16 14 her when I saw her with her clothes off.

03:04:19 15 Q. Did you tell her that?

03:04:20 16 A. I said, "I don't want to do this.
03:04:23 17 It's a bad idea."

03:04:24 18 And she said, "Do you like your
03:04:27 19 apartment? Do you like keeping your job?"

03:04:28 20 And I said, "This is wrong."

03:04:32 21 And she wouldn't let up.

03:04:33 22 Q. Well --

03:04:36 23 A. And in the moment, I had --

03:04:36 24 Q. When you say "she wouldn't let up,"
03:04:38 25 what do you mean by that?

Ronald Britt

1
2 A. I mean, she was touching me and
3 pulling at my clothes. And it was clear to me in
4 that moment, either I put out or I lose my job.
5 And when you lose your job as super, you lose
6 your apartment.

7 And although she's incredibly
8 unattractive naked, with her cottage cheese butt,
9 and her smelly -- fish-smelling twat, and her
10 sagging tits, and breath that would knock a
11 buzzard off a fertilizer wagon -- and I apologize
12 to the nice ladies in the room that they have to
13 hear this. But you do work for her. And you
14 better know that sexual harassment is not about
15 the sex; it's about control. And it's not a
16 women's issue; it's an employment issue. And it
17 was humiliating and disgusting. And I did it
18 because I wanted to keep my job. I care about
19 my job. I care about the people in the building.
20 And I'm done being bullied by the new queen of
21 mean, Doreen, complete with little dog, which bit
22 me, by the way.

23 Q. Is that your complete answer?

24 A. That's my complete answer.

25 Q. So, this advance, as you say,

Ronald Britt

happened several weeks after you went to
Pennsylvania; is that correct?

A. That's correct.

Q. And you say that it was clear to you
that if you didn't have sex with Ms. Alderman,
you wouldn't keep your job and your apartment; is
that correct?

A. That's correct.

Q. What, if anything, did she say about
your job during this advance, as you describe it?

MR. KOERNER: Objection. He
already testified that he made -- she
said, do you like -- want to keep your
job?

MS. GOULD: Excuse me. I'm
entitled to explore.

MR. KOERNER: Okay. Go ahead.
Repeat it.

MS. GOULD: So, back off.

Q. Go ahead.

A. What was the question?

Q. What did she say to you when she was
making this advance a few weeks after you came
back from Pennsylvania?

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Ronald Britt

03:06:24

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A. She said, "Do you want to keep your

03:06:26

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job?", as she's pulling at my clothes, and she's

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4

naked in my bed.

03:06:31

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Q. And did you respond to her verbally

03:06:34

6

in any way?

03:06:34

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A. I said, "This is a bad idea."

03:06:36

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Q. Did you say, "I'm not going to do

03:06:38

9

this"?

03:06:38

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MR. KOERNER: Objection; asked and

03:06:39

11

answered.

03:06:39

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A. No. In that moment, I realized that

03:06:42

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she was not backing off. Doreen will have her

03:06:45

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way. And as you get to know her, you'll find

03:06:49

15

that out.

03:06:49

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Q. What happened at this point in time?

03:06:51

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A. At this point in time, to be honest,

03:06:53

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I found it difficult to perform. So, she sucked

03:06:57

19

on my member. And when I did get it up, I did my

03:07:01

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very best to please her, but I don't think that

03:07:04

21

she orgasmed. But it didn't seem to matter to

03:07:07

22

her. Because at that moment, it seemed like she

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felt she had control of me, and I was just her

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minion at that point.

03:07:12

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Q. How long did this incident take?

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Ronald Britt

A. Probably from the moment she arrived to the moment she left, about an hour and a half.

Q. And this was, again, sometime in the first half of 2007?

A. It was early on, yeah.

Q. And you say that the sexual harassment by Ms. Alderman continued for -- this is in Paragraph 15 of your complaint. "The sexual harassment by Ms. Alderman continued for a period of approximately seven months;" is that correct?

A. It continued straight on.

Q. Sir, look --

A. In fact, I'm still being harassed by her.

Q. Please look at Paragraph 15 of your complaint.

(Witness peruses exhibit)

And I'm calling your attention to the second sentence in that paragraph.

(Witness peruses exhibit)

A. Yes.

Q. It says, "The sexual harassment by Ms. Alderman continued for a period of

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Ronald Britt

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approximately seven months and included instances

03:08:15

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of oral sex and sexual intercourse;" is that

03:08:19

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correct? That's what it says?

03:08:19

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A. That's true.

03:08:20

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Q. What is that seven-month period that

03:08:23

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is referred to in Paragraph 15 of the complaint?

03:08:26

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A. Well, throughout the time she was

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back in California, she would call me at all

03:08:29

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hours, odd hours.

03:08:30

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Q. No. I'm asking a different question,

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sir. I'm asking: What is the seven-month period

03:08:33

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of time that is specifically referred to in

03:08:34

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Paragraph 15 of the complaint?

03:08:36

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A. I don't recall exactly. But it's

03:08:38

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easy enough to come up with those dates by

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subpoenaing her phone records.

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Q. But your lawyer --

03:08:45

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A. And based on her phone records --

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Q. Sir. Sir --

21

A. -- you would be able to tell.

03:08:48

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MR. KOERNER: Is it possible the

03:08:48

23

seven months was the period that you guys

03:08:51

24

were having sex?

03:08:53

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THE WITNESS: Well, we only had sex

Ronald Britt

a few times.

MS. GOULD: Is it possible that you're giving speaking objections again and coaching the witness again?

THE WITNESS: We only had sex a few times.

Q. You had sex a few times.

How many times did you have sex?

A. Three times.

Q. And the first time is the one you just described; is that correct?

A. Correct.

Q. When was the next time?

A. The next time is, she flew in from California, unannounced, on a Friday.

Q. Well, she resides in California, doesn't she?

A. She did.

Q. And how frequently did she come to New York in 2007?

A. I don't know.

Q. Well, when she came to New York, is it true that she lived in an apartment at 91 East 3rd Street?

1 *Ronald Britt*

03:09:27 2 A. No, she didn't.

03:09:27 3 Q. Where did she live?

4 A. She lived on 9th Street.

03:09:29 5 Q. One of her other buildings; is that --

6 A. 415 East 9th Street.

03:09:33 7 Q. Okay. So, are you saying that you
03:09:34 8 didn't know when she came to town to check on the
03:09:37 9 buildings?

03:09:37 10 A. She would never say when she was
03:09:39 11 coming to town.

03:09:40 12 Q. But you knew -- when she arrived, you
03:09:43 13 knew that she was there; is that right?

03:09:43 14 A. She called me from the airport and
03:09:46 15 said, "Get ready."

03:09:47 16 Q. Well, I'm asking you whether --
17 withdrawn.

03:09:48 18 I'm asking you: How frequently --
03:09:49 19 during the time you were employed by Thermal/ /
03:09:52 20 Wavecrest, how frequently Ms. Alderman came to
03:09:55 21 town.

03:09:55 22 A. I don't know.

03:09:57 23 Q. And now, you're referring to an
03:10:01 24 incident that occurred after the one that you
03:10:03 25 have just described; right?

Ronald Britt

03:10:04 2 A. Correct.

03:10:05 3 Q. When you had sex in -- whose
03:10:07 4 apartment was it?

03:10:07 5 A. It was her apartment.

03:10:08 6 Q. And she called you from the airport,
03:10:10 7 is that what you're telling me?

03:10:12 8 A. That's right. That she was in town,
03:10:13 9 and she was in the mood.

03:10:15 10 Q. And when did that occur?

03:10:16 11 A. It was one Friday.

03:10:18 12 Q. In what year?

03:10:21 13 A. It was within that seven-month
03:10:23 14 period.

03:10:23 15 Q. And that seven-month period commenced
03:10:27 16 when?

03:10:27 17 A. It was not long after taking the job.
03:10:29 18 I can't be sure on the date, but I could
03:10:31 19 certainly nail it down if I can have her phone
03:10:34 20 records, and I'll go to my carrier and see if
03:10:37 21 they have phone records. And based on that, and
03:10:40 22 the invoices I was doing, and all the work I was
03:10:42 23 doing, I can certainly narrow that range down.

03:10:42 24 Q. But you hadn't bothered to do that
03:10:45 25 before today; is that correct?

Ronald Britt

03:10:45 2 A. No.

03:10:46 3 Q. Now, she called you from the airport,
03:10:49 4 and what did she say?

03:10:50 5 A. She said that she was in the mood;
03:10:52 6 she was in town; and I should be ready.

03:10:54 7 Q. And did you respond to her in any
03:10:56 8 way?

03:10:56 9 A. I said I would come over.

03:10:58 10 Q. And did you?

03:10:58 11 A. I did.

03:10:59 12 Q. Where did you go?

03:11:00 13 A. I went to her apartment.

03:11:02 14 Q. And this was on which street?

03:11:04 15 A. It was on 9th Street.

03:11:06 16 Q. And what happened? What time of day
03:11:08 17 was this, by the way?

03:11:09 18 A. It was in the evening.

03:11:10 19 Q. And what happened when you got to her
03:11:11 20 apartment?

03:11:12 21 A. When I got to the apartment she
03:11:15 22 jumped on me, and we had sex.

03:11:18 23 Q. And did you tell her you weren't
03:11:21 24 interested in having sex with her at that time?

03:11:24 25 A. At that point, I was just playing

Ronald Britt

ball.

Q. You were playing, what?

A. I was just going along with it, because I knew that I would lose my job if I didn't.

MR. KOERNER: "Playing ball" is what he said.

MS. GOULD: Sorry. I didn't understand what you said.

Q. And you had sex in her apartment. How long did this last?

A. We had sex twice.

Q. That night?

A. Correct.

And then I left, and I went to The Edge bar, where I was before, and I was having drinks with a few of the boys. And she called me like 15 times, insisting I come back.

Q. And did you?

A. At which time I went back, and I gave her a horse whip and told her that I am not her property and that I would not be having sex with her again.

Q. What is a horse chip?

Ronald Britt

03:12:04 2 A. It's a piece of braided leather you
03:12:07 3 used to whip horses.

03:12:09 4 Q. And you used a piece of leather on
5 Ms. Alderman; is that what you're saying?

03:12:10 6 A. No. I gave it to her to tell her
03:12:12 7 that I was not her property; I was not her
03:12:16 8 whipping boy and that I was not gonna be going to
03:12:18 9 bed with her again.

03:12:20 10 Q. And what did she say?

03:12:21 11 A. She told me to get out.

03:12:23 12 Q. And did you have sex with her again
03:12:25 13 after that?

03:12:26 14 A. I did not.

03:12:27 15 Q. And is it fair to say that this
03:12:29 16 incident that you're describing now, when you got
03:12:33 17 this phone call on a Friday and you had sex with
03:12:36 18 her twice that night, occurred sometime in 2007?

03:12:39 19 A. I would have to look at the records,
03:12:40 20 but I don't know.

03:12:41 21 Q. Well, it occurred within the
03:12:45 22 seven-month period that you're describing in
03:12:48 23 Paragraph 15; isn't that correct?

03:12:49 24 A. I would expect so, yes, ma'am.

03:12:51 25 Q. And I'm asking you: Was it in 2007

Ronald Britt

that that occurred?

A. I don't know. I'd have to look at a calendar and see.

Q. Well --

A. To be honest, I would -- I would want to review what records I do have.

Q. But you didn't do that before you came to this deposition?

A. I did not, because I really, you know, was hoping Doreen wouldn't lie about this. But, we'll see.

Q. And again, I'm asking you what the seven-month period is that you're referring to in your complaint.

A. Well, I can tell you that after I had sex with her that time, I did not have sex with her again. And we went to her mother's house the very next day to look into a few things there. And we had a little sit-down conversation, and we agreed that I would remain the super, and I would keep doing these jobs - many of which were not by the book and quite illegal - and I could keep my job.

MS. GOULD: Move to strike as

Ronald Britt

nonresponsive.

A. And I did several of these jobs.

Q. So, after the incident that you're just describing when she flew in and, quote, "surprised you," unquote, from California, you didn't have sex with her again; is that correct?

A. After that night, no.

Q. And she didn't ask you to have sex again; is that correct?

A. Instead, she kind of left it open.

Q. Did she ask you to have sex again?

A. No, she did not ask me to have sex again.

But she called me at all hours, on Christmas and in the middle of the night. She would come over to my apartment with a bottle of wine and say, "Oh, you've got to unfuck this job they're doing in my apartment renovation." She had me do all of the drawings and didn't pay me for them. She filed those drawings. And I have those drawings. So, if you want to see, did I do the work and did she have me do it without permits and -- and strictly by the book, yeah, I can show you all of that, as well.

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Ronald Britt

As I said, sexual harassment's about control, and it's an employment issue.

MS. GOULD: Move to strike as nonresponsive, because there's no pending question.

Q. Now, after you told Ms. Alderman that you weren't going to have sex with her again, did you ever see her socially after that?

A. I don't recall.

Q. Did you ever go to lunch with her after that?

A. I don't think so.

Q. And did you ever go to lunch --

A. Oh, yes, you know what --

Q. -- in Chinatown with her?

A. -- I did. I did.

Q. How many times did you go to lunch with her?

A. We went for escar -- we went for escargot. And in the cab, that's when she approved the extra 3,000 for the windows. And then, conveniently forgot to pay. And this gives me a really easy way to tell you exactly when that was, because that's when she fired off the

Ronald Britt

memo that, henceforth, any repairs were to be discussed, and bidden, and approved by Jay Yablonsky.

Q. Do you have a copy of that memo?

A. I can scare that one up. I think I can.

Q. Did you provide that to Mr. Koerner?

A. I think I may have. I'll have to look.

Q. I'm sure one of you will take a look.

So, in addition to that time that you're describing when you had escargot, did you ever have meals with Ms. Alderman again after you told her you weren't going to have sex with her?

A. There were other -- there were other outings before having sex with her initially. Is that what you're referring to?

Q. And what about after? No. What I'm referring to is after you told her you weren't going to have sex with her anymore, did you have any other outings with her?

A. I can't be sure -- oh, yes. There was a time we went to Far East Corner in Chinatown.

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Ronald Britt

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Q. That's a restaurant?

03:16:20

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A. Yes.

03:16:20

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Q. Okay. And when did that occur?

03:16:21

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A. It was when we were down looking at

03:16:24

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Division Street for something.

03:16:25

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Q. How much time elapsed -- between this

03:16:27

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incident that you described in which you had sex

03:16:31

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with her in her apartment when she called you

03:16:33

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from the airport, how much time elapsed between

03:16:35

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that and the time you had lunch with her down in

03:16:39

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Chinatown?

03:16:39

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A. I can't be sure.

03:16:40

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Q. Did you have lunch with her on any

03:16:42

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other occasion after you told her you were no

03:16:44

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longer going to have sex with her?

03:16:46

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A. I may have.

03:16:47

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Q. How many times?

03:16:48

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A. I wouldn't know.

03:16:49

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Q. What records would you have that

03:16:51

21

would show that?

03:16:52

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MR. KOERNER: If any.

03:16:54

23

MS. GOULD: Always, if any.

03:16:54

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A. I don't know that I would have any.

03:16:55

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Q. And do you recall having any outings

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Ronald Britt

with Ms. Alderman outside of New York City after you told her that you wouldn't have any more sex with her?

A. Not after.

Q. Do you recall going to the beach with Ms. Alderman after you told her you would not have sex with her?

A. That was not after. I went to the beach with her and her daughter. And I arranged for a chaperone for her daughter, as well, Jake Austlander. And I put money out of my pocket, so they could go ride the rides and have fun.

And I also once went to Lincoln Center with her.

Q. Oh. What did you see there?

A. They had a salsa band, and she liked salsa dancing. And I recruited some good salsa dancers to dance with her, because I don't dance. And I had a few drinks with her, and I thought everything would just be fine like that.

Q. And when did it -- this outing to Lincoln Center take place?

A. I could look at the schedule for Lincoln Center and give you an exact date on

1 *Ronald Britt*

2 that.

03:17:53 3 Q. If you can --

03:17:53 4 MR. KOERNER: Well, not an exact
03:17:54 5 date. But was it in between some of the
6 events that you're talking about?

7 MS. GOULD: Withdraw that. Wait.
03:17:57 8 Wait. Wait. Wait. Objection to your
03:17:58 9 coaching the witness.

03:17:59 10 Q. This was after you told her you would
03:18:01 11 not have sex with her; is that correct?

03:18:03 12 A. No, no, no.

03:18:03 13 Q. I'm asking you specifically: Did you
03:18:05 14 go on any social outings with Ms. Alderman after
03:18:09 15 you told her you would not have sex with her?

03:18:12 16 A. I don't recall, other than maybe some
03:18:14 17 lunches.

03:18:15 18 MR. KOERNER: What you've testified
03:18:16 19 already about?

03:18:17 20 Q. How many lunches?

03:18:18 21 A. I don't know.

03:18:18 22 Q. And are you testifying that you did
03:18:21 23 not go to any outings with Ms. Alderman that were
03:18:25 24 outside of the city after you told her you would
03:18:28 25 not have sex with her?

Ronald Britt

A. The only times I left the city with Doreen was to go to her mother's place --

Q. Which was where?

A. -- to her place in Pennsylvania. It's in New Jersey.

To Coney Island. And part of that Coney Island trip was to Breezy Point, I think. And the trip to Lincoln Center. That's all I recall.

Q. And these outings occurred when in relationship to your telling Ms. Alderman that you wouldn't have sex with her anymore?

A. Well, I don't know that I had anything but lunch after the last time we had sex.

Q. You don't know that you did or you didn't have any more lunches; is that correct?

A. I don't recall exactly if we went out of town for any other reason, other than that, but I don't believe so.

Q. And how many lunches did you have with her after you told her you wouldn't have sex?

MR. KOERNER: Objection; asked and

Ronald Britt

answered.

A. As many as she wanted to have.

Q. And did you ever find yourself in Edge bar with her after you told her that you didn't want to have sex with her?

A. Edge bar happens to be in the same building she owns, so I don't doubt that it's possible.

Q. Now, you referred -- withdrawn. I'll get back to that.

Looking at Paragraph 16 of the complaint, please. It's on Page 5.

And by the way, after you told Ms. Alderman that you were not going to have sex with her again, she didn't fire you, did she?

A. No, she didn't.

Q. And how much time elapsed between the time you told Ms. Alderman you wouldn't have sex with her again and the time you were terminated?

A. Several years.

Q. Now, looking at Paragraph 16 of the complaint, it says, "As soon as the sexual relationship ended, Ms. Alderman initiated a campaign to make plaintiff's work life miserable,

Ronald Britt

increasing the work demands on plaintiff."

A. That's correct.

Q. What do you mean by that?

A. Well, there were a few apartments to renovate. Jay said that everyone who works in the buildings really should be -- have their own insurance, which is a whole list of things you have to have, including, like, a million dollars worth of insurance. But Doreen said to simply get it done and not tell Jay about it.

Q. Get what done?

A. And get the renovations done. And they were not filed. And several people worked for them. So, I noticed that she didn't have any invoices from that period. But all of that money was paid to me on my invoices, and I then distributed that money to the people that did the work with me.

Q. So, you were paid for these renovations that you're talking about; is that correct?

A. I was.

Q. So, if there was an increased work demand, you also got increased compensation; is

Ronald Britt

that correct?

A. Yes; but it was work that I really didn't want to do.

Q. Did you ever tell Ms. Alderman that you didn't want to do that work?

A. I told her that it was against building code and illegal. And she said, "Just make sure it happens, and in a timely --

Q. And then, you did; is that right?

A. -- way. In a timely way.

Correct, I did.

And for that time, she was being sweet to me like she wanted to get back together.

Q. Did she pay you for that work, sir?

A. She did. But not all the work that I did, was I paid for.

Q. And did you ever complain to anyone that you weren't paid for, quote, "all the work that you did"?

A. I just wanted to hang onto my job, so I didn't say anything. I went along with it. And frankly, I was ashamed, humiliated, and embarrassed.

Q. But you didn't quit your job?

Ronald Britt

A. No.

I like my job, and I like the people in the buildings, and I like taking care of them.

Q. And you then go on to say in Paragraph 16 of your complaint, "Ms. Alderman subsequently engaged in a pattern of discrimination against plaintiff, consistently yelling at him, directing insults at him, disparaging his abilities, delaying and denying various payments to him, and sporadically refusing to address plaintiff's legitimate concerns regarding maintenance issues related to the four buildings he maintained for Thermalld."

A. That's all quite true.

Q. Okay. When you say she was consistently yelling at you, what are you referring to?

A. Well, there was a period I just couldn't do anything right. No matter how hard I tried or how good things were, it just wasn't ever enough. But I never received any written reprimands. Only just her vicious mouth.

Q. And where was she when she was consistently yelling at you?

1

Ronald Britt

03:23:33 2

A. When she would come into town.

03:23:35 3

Q. And how frequently did she come into

03:23:37 4

town between 2007 and 2013?

03:23:40 5

A. I don't know.

03:23:40 6

Q. And when she yelled at you --

03:23:42 7

A. I would say once every four or

03:23:45 8

five months.

03:23:45 9

Q. So, about twice a year; is that

03:23:48 10

correct?

03:23:48 11

A. Probably more than that.

03:23:49 12

Q. Not more than three times a year; is

03:23:51 13

that correct?

03:23:51 14

A. I wouldn't know, but I'm sure she has

03:23:54 15

a record.

03:23:55 16

Q. And when you say that she was yelling

03:23:57 17

at you --

03:23:58 18

A. Yeah. In front of Jay; and in front

03:24:01 19

of Rich, the porter; and sometimes in front of

03:24:06 20

Zing. Although he only speaks Chinese, it's

03:24:12 21

still pretty clear when your boss is yelling

22

at you for nothing, that it's embarrassing and

03:24:14 23

demeaning.

03:24:14 24

Q. And when you say -- when she yelled

03:24:16 25

at you in front of Jay, did Jay say anything to

Ronald Britt

her?

A. No.

Q. Did you say anything to Jay about the fact that she was yelling at you?

A. I think it was pretty understood between Jay and I that Doreen is kind of crazy.

Q. She's kind of crazy?

A. Yeah.

Q. Did you ever tell Jay --

A. Like, she'll tell you something --

Q. Did you ever tell Jay that you had a sexual relationship of any sort with Doreen Alderman?

A. I did.

Q. When did you tell him that?

A. The day that he told me my -- my employment was terminated.

Q. Prior to the time that he told you your employment was terminated, had you ever told Jay that you had a sexual relationship with Doreen Alderman?

A. I didn't.

Q. Did you ever tell Jay, prior to the time that he terminated you, that Ms. Alderman

Ronald Britt

was sexually harassing you?

A. I did not.

Q. And you never complained to any governmental agency, prior to the time that you were terminated, that Ms. Alderman was sexually harassing you, did you?

A. I did not.

I was embarrassed and ashamed.

MS. GOULD: Move to strike as nonresponsive.

Q. Now, when you say that Ms. Alderman was directing insults at you, what do you mean by that?

A. It means that nothing was ever good enough.

Q. Well, what were the insults that she directed at you?

A. Well, just your standard name calling. My name's Ron, so I would be mor-Ron, or some kind of idiot. Or, you know, "why do I even let you work for me?" This kind of thing.

Q. And during this time when she was directing insults at you, did she mention sex in any way?

Ronald Britt

03:25:49 2 A. No.

03:25:50 3 Q. And then, you indicate or you state
03:25:52 4 at Paragraph 16 that she was disparaging your
5 abilities.

03:25:56 6 what form did that take?

03:25:57 7 A. Just that nothing was ever good
03:26:00 8 enough.

03:26:00 9 Q. And over what period of time did that
03:26:03 10 occur?

03:26:03 11 A. Straight through to the -- to the
03:26:04 12 very end.

03:26:05 13 Q. So, over a period of --

03:26:07 14 A. The -- the remainder of that time.

03:26:09 15 Q. -- five or six years; is that what
03:26:11 16 you're saying?

03:26:12 17 A. For the first few months after the
03:26:14 18 last time we had sex, Doreen would call me at odd
03:26:17 19 hours to commiserate, cry on my shoulder. Called
03:26:22 20 me at Christmas in the middle of -- at midnight
03:26:24 21 and talk about how her father was passing. And,
03:26:28 22 you know, basically, just a lot of what I
03:26:31 23 consider just inappropriate stuff.

03:26:33 24 Q. And did you ever tell her it was
03:26:35 25 inappropriate stuff?

Ronald Britt

03:26:36 2 A. I didn't.

03:26:36 3 Q. And when you -- again, when you say
03:26:38 4 in your complaint that she was disparaging your
03:26:42 5 abilities, what did she say that disparaged your
03:26:43 6 abilities?

03:26:43 7 MR. KOERNER: Other than "mor-Ron"?

03:26:45 8 MS. GOULD: Yes.

03:26:46 9 A. Well, if you want an example, one of
03:26:51 10 the invoices that you provided shows that there
03:26:55 11 was a leak in her apartment. And I fixed it, and
03:26:58 12 the leak came back. And she blamed the plumber
03:27:03 13 for the problem and blamed me for not hassling
03:27:07 14 the plumber about it. But it turned out it was
03:27:10 15 a second problem. He had fixed the one problem,
03:27:13 16 and there was another problem. But I'm some kind
03:27:18 17 of idiot, because now there's a wet spot in the
03:27:21 18 same place that there was another one. And, you
03:27:22 19 know, never mind that it's a different problem.
20 It's my fault for being a bad super.

03:27:25 21 Q. And this you say is part of a pattern
03:27:27 22 of discrimination; is that correct?

03:27:29 23 A. Yeah. At a certain point -- I guess
03:27:32 24 it was right around the time that she started
03:27:35 25 dating the fellow she's dating now -- I couldn't

Ronald Britt

do anything right.

Q. And when was it that she started dating the fellow that she's dating now?

A. I think it's a couple years.

Q. And who is that fellow?

A. He was introduced to me as Richard.

Q. So, that's a couple of years ago, and several years after you had sex with her; is that correct?

A. Yes.

Q. And that's when she started disparaging your abilities; is that correct?

A. No. It was pretty much when it was clear I wasn't going back to bed with her, that's when the constant chiding and riding began.

Q. And did she disparage your abilities in front of anyone?

A. You mean, besides my coworkers and Jay?

Q. Well, which coworkers was she disparaging --

A. Richard Usera, the sup -- the --

MR. KOERNER: Objection; asked and answered.

Ronald Britt

You can go ahead and answer.

Q. Go ahead.

A. And Zing.

Q. And Jay, is what you're saying?

A. And Jay.

Q. And when she disparaged your abilities in front of Jay, did Jay say anything?

A. No.

Q. And did you say anything to Jay?

A. We would talk privately sometimes.

Q. And what was it that you talked about privately?

A. That Doreen was crazy, and that she would say things that she would immediately forget and correct herself later, and constantly contradict herself - approve one thing, and then not another. And the last time we spoke privately was when he fired me, and I told him that I had made the mistake of going to bed with her. He said, quote, "That explains everything."

Q. And who else was present when you had this conversation?

A. Just Jay and I.

But I feel quite certain Jay won't

Ronald Britt

lie. He goes to shul a lot.

MS. GOULD: Move to strike as nonresponsive.

Q. And you mentioned that as part of this so called pattern of discrimination, Ms. Alderman delayed and denied various payments to you; is that correct?

A. I think we submitted some invoices that demonstrate that clearly.

MR. KOERNER: You talked about one of them today.

Q. You submitted some invoices --

A. You have one in your hand.

Q. You submitted some invoices which you say were not paid; is that correct?

A. It's been over a year --

Q. How many invoices --

A. -- and that was \$1,250.

Q. And how many invoices did you submit that were not paid?

A. I'd have to draw that up. But if you'd like, I'll have that for you Friday.

Q. More than one?

A. Oh, yes, ma'am.

1 *Ronald Britt*

03:29:49 2 Q. More than two?

03:29:50 3 A. Oh, yes, ma'am.

03:29:52 4 Q. But you don't know how many; is that
03:29:54 5 correct?

03:29:54 6 A. Well, I can give you a big list of
03:29:56 7 them, including some, like, ridiculous emails
03:30:01 8 that she tagged onto it about, "Oh, there's a lot
03:30:02 9 of bills, and we don't -- and, you know, we don't
03:30:05 10 really have that much money right now."

03:30:08 11 Q. And how many emails along those lines
03:30:09 12 did she send you?

03:30:09 13 A. I'd have to look through them.

03:30:10 14 Q. Was any one of them related to
15 Manuel?

03:30:14 16 A. Manuel?

03:30:15 17 Q. Yeah, Manuel.

03:30:16 18 A. I don't know.

03:30:17 19 But he was in the hospital a few
03:30:19 20 times, and she didn't even so much as send him a
03:30:23 21 set of flowers or a card.

03:30:24 22 I would go and check on him.

03:30:27 23 Q. So, was that part of the pattern of
03:30:30 24 the discrimination against you - that she didn't
03:30:32 25 check on Manuel?

Ronald Britt

A. No, ma'am.

Q. And when you say, "Sporadically refusing to address plaintiff's legitimate concerns regarding maintenance issues related to the four buildings he maintained for Thermal, what are you referring to?

A. Specifically?

Q. Yes.

A. Well, I would point out, the one time I was standing on the roof of 319 East 9th Street, and there was a broken vent pipe leaning hazardously, and her concern was getting rid of a satellite dish that had been married to the -- this wall. She had promised me, in front of Jay, that if I took care of that, painted the corridors, which is not part of my mandate, and a few other freebies, that she would give me the job at Division Street to paint, because they had a lot of chipped pain. And I might have all this documented. The issue was that it had to be done in accordance with the lead renovators stipulation; and so, I gave her a price based on that. I took care of her rider of do this, do that, do the other, and you can have the job.

Ronald Britt

And then, she awarded the job to the people who are working for her now, Bill and Amy. And they did not take care of any of that stuff, and put everyone in that building at risk - there are children, women of pregnancy age. And she just banged it out with no regard.

Q. When did this occur?

A. It's a few years ago. I can get you a time.

But the legitimate concern would be that lead poison is no joke, and there are laws about it. And she was risking a \$38,000 fine if she got caught.

Q. And did you ever report this condition to anyone?

A. I explained it to her, but I did not rat her out, no.

Q. You didn't report it to any governmental agency?

A. I did not.

Q. And did you ever report this concern to Jay Yablonsky?

A. I did.

Q. And what did he tell you?

1 *Ronald Britt*

03:32:39 2 A. He said, "Let it ride."

03:32:42 3 Q. And this was a few years ago; is that
03:32:45 4 correct?

03:32:45 5 A. It's when we did the job, yeah.

03:32:49 6 But as far as my procedure, I
03:32:52 7 documented it all, as required. And I provided
03:32:59 8 her a copy of the lead renovators handbook, as
03:33:04 9 well.

03:33:04 10 Q. Where is that documentation?

03:33:06 11 A. It's on my computer.

03:33:08 12 Q. You indicated that you didn't make
03:33:10 13 any complaints to any governmental agency
03:33:13 14 regarding the alleged harassment by Ms. Alderman
03:33:18 15 prior to the time that you were terminated; is
16 that right?

03:33:20 17 A. As I said, I was humiliated,
03:33:24 18 embarrassed, and I wanted to keep my job.

03:33:24 19 Q. And you didn't make a complaint to a
03:33:25 20 governmental agency; is that correct?

03:33:27 21 A. Correct.

03:33:28 22 Q. Now, did you complain to anyone --
23 withdrawn.

03:33:30 24 And you didn't complain to Jay
03:33:31 25 Yablonsky --

1 *Ronald Britt*

2 MR. KOERNER: Objection.

03:33:31 3 Q. -- about any sort of sexual
03:33:34 4 harassment prior to the time that he --

5 MR. KOERNER: Objection; asked and
6 answered.

03:33:37 7 Q. -- terminated you; is that correct?

03:33:37 8 A. I answered that.

03:33:39 9 Q. You did not make that complaint, is
03:33:42 10 that correct, to Jay?

03:33:43 11 A. Not until the day he said, "You're
03:33:46 12 fired. I need the keys back."

03:33:48 13 Q. Did you make a complaint to anyone
03:33:50 14 that you were sexually harassed by --

03:33:51 15 A. Yeah, I did.

03:33:52 16 Q. Well, let me just finish my question,
17 please.

03:33:52 18 Did you make a complaint to anyone
03:33:54 19 that you were sexually harassed by Ms. Alderman
03:33:58 20 prior to the time that you were terminated?

03:34:00 21 A. Yes, I did.

03:34:00 22 MR. KOERNER: Objection; asked and
23 answered.

03:34:01 24 You can go ahead and answer.

03:34:01 25 A. Yes, I did.

Ronald Britt

Q. And to whom did you make such a complaint?

A. Oh, maybe 50, 60 people.

Q. And give me the names of some of those people.

A. All right. Mike Rich.

Q. Mike Rich is, who?

A. He owns The Edge bar. And he was drinking with me on the night that Doreen was calling nonstop. And he said, "You know, you should just go over there and service her, and keep it to yourself."

Q. Well, isn't it true that he told you it was a bad idea to have a sexual relationship with Ms. Alderman?

A. He did. But once I was having a sexual relationship, he's like, "You want to keep your job, you better just play ball."

And a couple of women in the building.

Q. Which women?

A. A couple of women in the building.

Q. Which women?

A. Well, I don't want to have to name

1 *Ronald Britt*

03:34:48 2 them, because, obviously, there will be
03:34:51 3 repercussions.

03:34:51 4 MR. KOERNER: You have to name
03:34:52 5 them, Ron.

03:34:52 6 A. All right. Joann Wasserman.

03:34:57 7 Q. Where does she live?

03:34:58 8 A. She lives at 91 East 3rd.

03:35:00 9 Q. When did you complain to her?

03:35:01 10 A. She confronted me about it, because
03:35:06 11 she heard about it from Patty, who was my
03:35:09 12 neighbor.

03:35:10 13 Q. Who's Patty?

14 A. She --

03:35:10 15 Q. Is that Patricia Clark?

03:35:12 16 A. Correct.

03:35:12 17 And they --

03:35:12 18 Q. And did you complain to Patty?

03:35:14 19 A. Patty was aware of the situation.

03:35:16 20 Q. How was she aware of the situation?

03:35:18 21 A. Because in the village people gossip,
03:35:21 22 and everybody knew this was going on.

03:35:24 23 Q. What was going on?

03:35:25 24 A. That I had had sex with Doreen, and I
03:35:28 25 wasn't having sex Doreen, and she was making my

Ronald Britt

1
2 life miserable. And every time she was in town,
3 it was common code among my group of friends, who
4 are mostly musicians and do stop into the
5 basement and play music with me all the time,
6 that if there was a light on at her apartment, it
7 was a light on at the Frankenstein Place. And
8 everybody would be walking on eggshells.

9 Q. And what does that mean,
10 "Frankenstein Place"?

11 A. It's a reference to a movie.

12 Q. And what does it mean when there's a
13 light on at Frankenstein's?

14 A. That Doreen was in town, and to walk
15 on eggshells.

16 Q. To be quiet, is that what you mean?

17 A. Everything. Just -- you couldn't
18 even breathe.

19 Q. Who did you actually -- withdrawn.
20 To whom did you actually complain
21 that Ms. Alderman sexually harassed you, prior to
22 the time that you were terminated?

23 A. I think we've provided a list with
24 phone numbers to you guys.

25 Q. With some phone numbers.

1 *Ronald Britt*

03:36:26 2 MS. GOULD: Give me a second.

03:36:29 3 A. Anyway, when I --

03:36:30 4 MR. KOERNER: Wait. Wait. There's
03:36:32 5 no question.

03:36:34 6 MS. GOULD: Just give me a second.

03:36:36 7 MR. KOERNER: As the day goes on,
03:36:38 8 you get tired and you start forgetting
03:36:40 9 about the guidelines. Answer the
03:36:44 10 questions, yes, no. Listen to the
03:36:44 11 question and answer it. Don't start
03:36:46 12 talking about other stuff.

03:37:01 13 Give me one second.

03:37:03 14 MS. GOULD: Sure.

15 *(Recess held from 3:37 to 3:41 p.m.)*

03:41:06 16 CONTINUED EXAMINATION BY MS. GOULD:

03:41:06 17 Q. So, you were referring, Mr. Britt, to
03:41:09 18 a list that you provided to us with some names
03:41:12 19 and phone numbers; is that correct?

03:41:14 20 A. That's right.

03:41:15 21 Q. And what was that list intended to
22 be?

03:41:17 23 A. I think you guys asked me for people
03:41:20 24 I complained to about this.

03:41:22 25 Q. Right.

Ronald Britt

MS. GOULD: Mark this, please.

(Whereupon, 11-page Plaintiff's Amended Response to Defendant Thermal Realty I, LP and Doreen Alderman First Set of Interrogatory Requests was marked as Exhibit 13, for id.)

Q. Mr. Britt, looking at Exhibit 13, which is entitled Plaintiff's Amended Response to Defendant Thermal Realty I, LP and Doreen Alderman First Set of Interrogatory Requests.

(Handing)

(Witness peruses exhibit)

Do you see that?

A. Yes.

Q. And next to this - and I've tabbed this off for you in orange - is a rider.

Do you see that?

A. Yes.

Q. And there are 21 names variously with phone numbers, or addresses, or both, or neither on this rider.

Do you see that?

A. Yes.

Q. And what are these names intended to

Ronald Britt

be?

A. These are people that are aware of how stressful it was whenever Doreen was in town. And people I complained to about, having had sex with Doreen, that now she was giving me what a poet once described as no fury like a woman scorned.

Q. Did you ever use the words "sexual harassment" to any one of the people on this rider?

MR. KOERNER: If you remember using those specific words.

A. I believe so, yes.

Q. To which individuals did you complain specifically that Doreen Alderman was engaging in sexual harassment of you?

A. Mike Rich. Mike Lublin. Haig Hovin. Ken O'Rourke. That's my cousin; he's aware of every minute of it. Pietro Cappello.

MR. KOERNER: You said "sexual harassment" to each of these people?

THE WITNESS: Oh, yeah.

Q. Go ahead.

A. Patricia Clark.

1 *Ronald Britt*

03:44:27 2 I don't know why Sean Seymour is
03:44:29 3 listed on this.

03:44:30 4 Q. Did you complain about sexual
03:44:33 5 harassment to him?

03:44:33 6 A. No. You know what, that's -- I know
03:44:35 7 him as Cleet. Yeah.

03:44:36 8 Q. Cleet, can you spell it?

9 MR. KOERNER: Cleet the Beat.

10 A. C-l-e-e-t.

03:44:42 11 Yeah, Cleet the Beat.

03:44:45 12 Darryl Thomas, Matt Mentzger,
13 Giovanni P-l -- I'm sorry. P-a-l-a-c-i-o-s.
03:45:01 14 Eliza Blynn.

03:45:01 15 Q. Well, without going through each of
03:45:14 16 the remaining names, 12 through 21, is there
03:45:16 17 anyone to whom or with whom you did not use the
03:45:19 18 phrase "sexual harassment"?

03:45:21 19 A. I don't believe so.

20 Gary Austlander.

03:45:31 21 MR. KOERNER: Yes, basically, all
22 of them?

23 THE WITNESS: Yeah.

24 MR. KOERNER: The question now is:
03:45:34 25 who did you not say "sexual harassment"

Ronald Britt

to?

A. You know, I don't think I said "sexual harassment" to Oliver. But he asked me why I was so keyed up once, and I said, because Doreen's in town, and I'm living under this sort of Damocles, and she makes my life a living hell. So, except for Oliver, I would say, everyone.

Q. Now, who is Mike Lublin? What relationship does he have to you?

A. He was an employee of Doreen's for some time, helping out and covering while I was on vacation. He's also a guitar player.

Q. And where does he play his guitar?

A. Sometimes we play together in a band.

Q. Now, speaking of guitar, I showed you earlier in the deposition a lease for that basement space, about which you answered questions earlier.

Do you remember that?

A. My shop.

Q. Your shop.

And what other activities do you engage in, in your shop?

A. I work.

1

Ronald Britt

03:46:39

2

Q. What kind of work do you do?

03:46:42

3

A. All manner of things.

03:46:43

4

Q. Do you play music in your shop?

03:46:46

5

A. Sometimes I'm working on amplifiers.

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Sometimes I'm working on guitars. Sometimes I'm

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7

working on a song.

03:46:49

8

Q. Do you play music in your shop?

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A. Oh, yeah. Sometimes we do.

03:46:53

10

Q. And do other people play music with

03:46:55

11

you in your shop?

03:46:56

12

A. Yes, we do.

03:46:57

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Q. And how frequently does that occur?

03:47:00

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A. Not often enough in my book. But,

03:47:02

15

occasionally.

03:47:03

16

Q. How many times a week does that

03:47:04

17

occur?

03:47:04

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MR. KOERNER: Objection.

03:47:06

19

You can answer.

03:47:06

20

A. There's whole weeks that go by where

03:47:10

21

no music is played. And then, there's weeks

03:47:10

22

where two or three times through the week.

03:47:13

23

Q. And at any one time, what's the

03:47:16

24

maximum number of people that are in that

03:47:19

25

basement space, playing music, when they play?

Ronald Britt

A. It varies.

Q. What's the maximum number that you ever had there, playing music?

MR. KOERNER: That are playing music at one time?

MS. GOULD: Yes.

MR. KOERNER: Maximum number of people playing music.

A. Maybe 11 or 12.

Q. And how many times have you had 11 or 12 playing music in this space?

A. Many times.

Q. Okay. Over what period of time have you and others been playing music in that space?

A. Since day one.

Q. Who is Haig Hovin?

A. He's a friend of mine.

Q. Where does he live?

A. I think he lives now in Greenpoint.

Q. Greenpoint, New York?

A. Yeah.

Q. Do you have an address for him?

A. Brooklyn.

Yeah, I think I do.

Ronald Britt

03:48:07 2 Q. And will you provide that to your
03:48:10 3 lawyer, please?

03:48:11 4 A. Yeah.

03:48:12 5 Do you want me to look it up right
03:48:14 6 now?

03:48:14 7 Q. No.

8 *DOCUMENT/DATA REQUESTED:* _____

03:48:16 9 Q. Who is Ken O'Rourke -- or, you said
03:48:17 10 he's your cousin.

03:48:18 11 A. That's my cousin.

03:48:18 12 Q. Where does he live?

03:48:20 13 A. Tampa, Florida -- actually,
03:48:22 14 St. Petersburg.

03:48:23 15 Q. When did you complain to him about
03:48:24 16 Ms. Alderman?

03:48:25 17 A. From day one.

03:48:27 18 Q. And you used the phrase "sexual
03:48:30 19 harassment" to Mr. O'Rourke?

03:48:32 20 A. Yes.

03:48:33 21 Q. And do you have an address for him?

03:48:34 22 A. No; but I can get you one.

03:48:37 23 *DOCUMENT/DATA REQUESTED:* _____

03:48:37 24 Q. And who is Mr. Cappello?

03:48:39 25 A. He's just a person I know. He's

Ronald Britt

helped me on occasion with various handy jobs.

Q. Has he helped you at any Thermal property?

A. I don't recall if he has or not.

Q. When's the last time you saw him?

A. Last time I saw Pietro was, I think, four -- four days ago.

Q. When did you complain to him about Ms. Alderman?

A. All along.

Q. And Ms. Clark is a tenant; is that correct?

A. Yes, she is.

Q. And are you saying that you complained to her about Ms. Alderman?

A. Yes.

Q. When did you do that?

A. After the first time we had sex.

Q. And any time thereafter?

A. She always asks me about it.

Q. She asks you about what?

A. About, is Doreen still hassling me.

Q. And who is Cleet Seymour?

A. He's a friend of mine.

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Ronald Britt

Q. And what is his address?

A. I can get that for you.

MS. GOULD: Please provide it to
your lawyer.

DOCUMENT/DATA REQUESTED: _____

Q. And when did you complain to him
about Ms. Alderman?

A. All along.

Q. And who is Darryl Thomas?

A. He's a friend of mine.

Q. And what's his address?

A. I'll get it for you. He lives in
Elmont.

DOCUMENT/DATA REQUESTED: _____

THE WITNESS: Darryl was there from
the very beginning. At the time, he was
living in a shelter; and when I first
agreed to rent the basement, he went to
the shelter and got 12 other guys to help
me transform it from a total, total sewer.
I mean, if you want a description, I'll
happily tell you, but Darryl was
instrumental in helping me get it
together, and he's been there from day